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Via ECF

The Honorable J. Paul Oetken
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Jackson v. American Civil Liberties Union, et al.
Case No. 1:21-cv-05037-JPO

Dear Judge Oetken:

We represent Defendants in the above-captioned action. Pursuant to the Confidentiality Stipulation and Order in this matter dated October 8, 2021 [dckt. entry no. 21], we respectfully seek leave to file (1) Defendants' Memorandum of Law in Support of their Motion for Summary Judgment, (2) Defendants' Rule 56.1 Statement, (3) the Declaration of Michele A. Coyne in support of Defendants' Motion for Summary Judgement, and (4) all exhibits to the Coyne Declaration under seal, as they contain or otherwise reference materials designated as confidential by the parties under their Confidentiality Stipulation.

In an abundance of caution, we are also provisionally and contemporaneously filing the foregoing documents under seal in accordance with Section 2(E)(ii)(a) of Your Honor's Individual Rules and Practices and the SDNY ECF Instructions.

Thank you for your consideration in this matter.

Very truly yours,

/s/ Tamanna Rubya
Tamanna Rubya

cc: All Counsel of Record (via ECF)